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Comments on "Why Not Use It All?"

The recent editorial by George Lucier (*1*) mischaracterizes the two key aspects of the Society of Toxicology (SOT)–European Society of Toxicology (EUROTOX) debate, which was a part of the program of the March 1999 SOT Annual Meeting held in New Orleans, Louisiana. First, the debaters represented neither an SOT motion nor a EUROTOX motion, i.e., this is not a situation where the two societies have taken an official position on an issue. Second, the debate was not intended to persuade the audience to simply accept one side and jettison the data presented by the other side. The SOT–EUROTOX debate provides a public forum for airing different viewpoints and differences in interpretation of data surrounding a scientific issue. It is framed deliberately in a provocative fashion to stimulate an open, thorough discussion. This type of discussion facilitates introspection and leads to an enhanced understanding of the issue at hand.

The particular debate in question focused upon the following hypothetical motion: "The Results of Mechanistic Toxicity Studies Should Supersede Ambiguous Epidemiological Data." This debate was a part of an annual cooperative activity between two of the largest professional organizations of toxicologists in the world: the SOT and EUROTOX. A topic chosen jointly by the program committee of each society is debated at each society's annual meeting, the SOT meeting in March and the EUROTOX meeting in June. The two program committees select a member of their respective society to participate in the debate, and the same individuals debate the issue in the United States and in Europe. In addition to selecting a new topic and new debaters each year, the "side" that each society takes changes yearly, i.e., in even-numbered years EUROTOX speaks for the motion and SOT speaks against it, whereas the SOT speaks for the motion and EUROTOX against it in odd-number years. Importantly, the topic does not represent an official position of either society. Rather, a considered extreme "pro" and "con" side of the issue is set initially to force each side to marshal their best rationale. Furthermore, substantial time for audience participation is an integral component of the program. Over the years we have learned that this format facilitates an open discussion that entails the presentation of a full range of views leading to a more thorough understanding of the issue at hand. Often an individual debater may speak to an issue in which he or she has an extensive record of publication; however, this is not always the case. The prime objective is to select debaters who will develop strong arguments for the side they are taking in a fashion analogous to an attorney making the best argument for his or her client.

Contrary to Lucier's editorial (*1*), this format not only permits, but indeed demands, full consideration of all relevant data sets. The scientific expertise of the chosen debaters plus the public nature of the debate, combined with ample time for both questions and comments from the audience, ensures that this occurs. It is not a simple case of choosing between two opposite poles. Experience has demonstrated the scientific value of the debate. It serves to enhance critical, constructive thinking concerning the issue at hand. Typically, this session draws a packed room and, judging by the attentiveness of the audience and their enthusiastic participation in the discussion, it is a highly valued component of our annual meeting.

We welcome more open dialog on the value of this and other specific components of the SOT annual meeting program, which is intended to provide an international forum for discussion of important and sometimes controversial issues related to the science of toxicology.

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"Why Not Use It All?": Another View

I join enthusiastically in Lucier's well crafted editorial argument (*1*) that full assessment of the carcinogenic potential of chemical compounds requires examination of epidemiologic, toxicologic, and mechanistic data. To ignore information from any of these three sources would be wasteful, short-sighted, and not in the best interests of protecting public health.

There is, however, a fourth dimension of carcinogenic risk assessment that has not to date received adequate consideration. This is the developmental dimension. The young of all mammalian species have exposures and vulnerabilities to chemical carcinogens that are qualitatively and quantitatively different from those of adults. The special susceptibilities of human babies were examined in detail in the 1993 National Academy of Sciences report *Pesticides in the Diets of Infants and Children* (*2*).

The EPA Guidelines on Carcinogenic Risk Assessment, on which Lucier comments in his editorial (*1*), pay only scant attention to developmental biology. The current draft of these guidelines continues to embody the outmoded fiction that the entire American population can be represented by an adult white male who weighs 70 kg. Until our national policy on carcinogen risk assessment moves beyond this limiting assumption and begins to require explicit consideration of pediatric exposures and risks, there will be little incentive for researchers to explore pathways of exposure, patterns of disease, or mechanisms of carcinogenesis in the young. We are not yet using all of the data.

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Air Toxics Concentrations of Methyl Chloride

On behalf of the Methyl Chloride Industry Association (MCIA; which comprises the following domestic producers of methyl chloride: Dow Chemical Company, Dow Corning Corporation, General Electric Company, and Vulcan Materials Company), I would like to alert you to certain incorrect statements concerning methyl chloride contained in "Public Health Implications of 1990 Air Toxics Concentrations across the United States" (*1*). In this letter, I will briefly summarize these incorrect statements and provide a